UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

SEP 11 1996

MEMORANDUM

SUBJECT: Request for a Time-Critical Removal Action and an Exemption from the $2 Million Statutory Limit at the Westbank Asbestos Site, Marrero, Jefferson Parish, Louisiana

FROM: John J. Martin, Senior On-Scene Coordinator
Site Response Section (6SF-R2)

THRU: Charles A. Gazda, Chief
Response and Prevention Branch (6SF-R)

Myron O. Knudson, P.E., Director
Superfund Division (6SF)

TO: Jane N. Saginaw
Regional Administrator (6RA)

I. PURPOSE

This memorandum requests approval for a time-critical removal action and exemption from the $2 million statutory limit pursuant to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(c) at the Westbank Asbestos Site (Site) located in Marrero, Jefferson Parish, Louisiana.

As contemplated by CERCLA Section 104(c)(1)(A), 42 U.S.C. § 9604(c)(1)(A), the request for exemption from the $2 million statutory limit is based on three criteria: (1) The action proposed to be undertaken is necessary to prevent, limit, or mitigate an emergency situation at the Site in that asbestos-containing materials (ACM) long present at the site are rapidly losing structural stability and becoming increasingly more friable; (2) there is an immediate risk to public health or welfare or the environment in that increased deterioration of ACM increases likelihood of transmission and passage of ACM through multiple pathways of exposure; and (3) such assistance will not otherwise be provided on a timely basis due to the Louisiana Department of Environmental Quality's (LDEQ's) lack of resources necessary to adequately respond to the emergency.

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The proposed action for the Site includes excavation of ACM materials found in the residential properties and public access areas. The initial targets for removal will be the ACM locations found within one block of the schools and day-care centers. ACM excavated from the site will then be properly disposed of in a local landfill. Furthermore, for ACM found at a depth greater than two feet, a geo-fabric liner will be used to cover such area and then backfilled.

The proposed action described in this Action Memorandum meets the criteria for initiating a removal action under Section 300.415 of the National Contingency Plan (NCP), 40 CFR § 300.415. Furthermore, the action proposed in this Action Memorandum meets the criteria for an emergency exemption from the $2 million removal spending limitation found at CERCLA Section 104(c)(1)(A), 42 U.S.C. § 9604 (c)(1)(A). This action is not being initiated under the On-Scene Coordinator's $50,000 authority.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS # LAD985170711
Category of removal: Time Critical
Site ID # Y6
Latitude 29°53'58" North Longitude 90°06'45" West

A. Site Description

1. Removal site evaluation

The Site consists of six communities located on the opposite bank of the Mississippi River from the city of New Orleans, Louisiana. The Site includes the Jefferson Parish communities of Bridge City, Westwego, Marrero, Harvey, and Gretna, as well as the Orleans Parish community of Algiers. The Site consists of the areas determined to be contaminated with asbestos-containing materials (ACM). The ACM is found in residential properties and other public access areas. The apparent source of the ACM was from a Johns-Manville plant located in Marrero.

Site assessments by the Louisiana Department of Environmental Quality (LDEQ) and the Environmental Protection Agency (EPA) began at the Site in early 1990. Subsequently, EPA completed a Preliminary Assessment and Site Inspection for the Site. In March 1995, the Site Inspection resulted in a decision that No Further Remedial Action Planned under Superfund (NFRAP) was needed at that time.

In November 1995, the LDEQ contacted the EPA On-Scene Coordinator (OSC) and expressed concern that much of the ACM structural stability had rapidly deteriorated and the material was rapidly becoming friable. The OSC tasked the Technical Assistance Team (TAT), now the Superfund Technical Assessment and

In November 1995, the LDEQ contacted the EPA On-Scene Coordinator (OSC) and expressed concern that much of the ACM structural stability had rapidly deteriorated and the material was rapidly becoming friable. The OSC tasked the Technical Assistance Team (TAT), now the Superfund Technical Assessment and Response Team (START), to provide a thorough characterization of the Site. In January and February of 1996, START, accompanied by LDEQ personnel, conducted a street by street visual inspection of potential ACM areas. The START found that much of the ACM had become extremely friable since their last site assessment in 1990. To date, 582 properties have been identified as containing structurally deteriorating ACM. These properties included driveways, servitudes, walkways, and other sites. In most of these locations, the ACM is subjected to mechanical disturbances such as wheel loading, walking pressures, recreational activities, mowing, driving, etc., that contribute substantially to the structural deterioration and consequent friability.

The START visited the Site in March 1996 to collect 60 bulk samples and 30 soil samples. Utilizing Polarized Light Microscopy (PLM) analytical methods, the 60 ACM bulk samples had an average percent asbestos value of 43%: 32% chrysotile, 9% crocidolite and 2% amphiboles. The 30 soil samples were collected in drainage pathways at varying distances leading away from three different ACM areas. These were analyzed using Transmission Electron Microscopy (TEM) with the recommended method outlined by Chatfield 1988 "Analysis of Vinyl Floor Tile." The results indicated an asbestos concentration of 24% to 30% chrysotile/amphibole by weight.

Also, several alarming observations were made in the residential areas. Children were seen playing on driveways composed of friable ACM with toys and basketballs. A resident was seen mowing his grass with ACM outcropping in the yard. Additionally, vehicles were observed creating dust clouds when passing over areas that contained the ACM. All of these routine activities are expected to increase ACM friability and dramatically increase human exposures.

As a result of the recent Removal Assessment, EPA determined that a removal action is necessary and appropriate at this time. This is based on the substantial threat of release into the environment, and the imminent and substantial danger to public health and welfare presented by the hazardous substance, asbestos, at the Site.

2. Physical location

The Site is situated in an area referred to as the Westbank and stretches approximately eight miles east-to-west and six miles north-to-south. The Mississippi River forms the northern border of the Westbank. The Site consists of six Westbank

communities of Bridge City, Westwego, Marrero, Harvey, Gretna, and Algiers. The estimated population of the communities included in the Site is 183,000.

A former Johns-Manville plant located in Marrero is the apparent source of the ACM. The plant is positioned in the north-central portion of the Site which is where the majority of ACM locations are found. The geographic coordinates near the former Johns-Manville south entrance (corner of Pine and 4th Streets) are Latitude 29°53'58" North and Longitude 90°06'45" West.

3. Site characteristics

Records indicate that the Johns-Manville plant operated from 1929 to 1975. The plant produced various types of asbestos containing products, chiefly an asphaltic roofing material. An asbestos containing aggregate was produced as a by-product during manufacturing operations. The aggregate was pulverized in a hammer mill and mixed with a filler, usually composed of gypsum, dolomite, or calcite. The asbestos aggregate and filler formed a concrete-like material when mixed with water and therefore was considered by many local residents to be a concrete substitute for construction purposes.

During the period from 1955 to 1965, this ACM was offered to local residents free-of-charge, and was used for construction of driveways, servitudes, walkways and other areas. Consequently, many of these areas in the residential communities surrounding the former Johns-Manville plant contain ACM waste. No records were available regarding the quantity, location and exact time period in which the ACM was distributed to the public.

4. Releases or threatened release into the environment of a hazardous substance, pollutant or contaminant

The contaminant of concern at this site is asbestos which is a designated CERCLA hazardous substance as defined at CERCLA Section 101(14), 42 U.S.C. § 9601(14), and further defined at 40 CFR § 302.4.

Thus far, the Removal Assessment has identified 582 locations at the Site which have ACM. The ACM locations include three schools and three day care centers. The total volume of the ACM is estimated to be 8,000 cubic yards. Inhalation is the exposure route of greatest concern regarding asbestos. Another route of exposure that merits concern is ingestion. Several sampling events have confirmed the release of asbestos fibers from the ACM into the air and soil pathways. Furthermore, the ACM has been observed to have rapidly deteriorated the last few years such that many of the ACM locations may be classified as friable asbestos. This rate of structural deterioration has been

under observation by State officials for the last several years. However, the recent observations indicate that structural integrity of the ACM has reached a critical low point, resulting in the release or threatened release of friable asbestos. Therefore, immediate action is warranted.

5. NPL Status

This Site is not presently on the National Priorities List (NPL) for remedial action. If the Site were to be placed on the NPL, the current removal actions would be consistent with any future remedial action due to the fact that the actions proposed herein constitute source control measures.

6. Maps, Pictures and other graphic representations

Attachment 1 Enforcement Addendum
Attachment 2 Letter from LDEQ
Attachment 3 Site location map and site sketch
Attachment 4 ATSDR Health Consultation

B. Other Actions to Date

1. Previous actions

The LDEQ conducted a sampling mission in the Westbank area on January 12, 1990. This sampling mission included the collection of 10 bulk samples from various residential locations and one air sample using a high volume sampler. Analyses of the ACM bulk samples indicated the material contained up to 60% chrysotile and crocidolite. The analysis of the air sample revealed 3×10^{-7} fibers per cubic centimeter (f/cc).

On February 6, 1990, the LDEQ contacted EPA Region 6 Emergency Response Branch (now the Response and Prevention Branch (RPB) for assistance in investigating the potential asbestos health hazard associated with the Site. The RPB conducted a site assessment in March 1990 that included air sampling of three randomly selected residential locations. Eleven air samples were collected and analyzed using phase contrast microscopy (PCM). Three of these PCM samples were also analyzed using the transmission electron microscope (TEM). The results indicated asbestos concentration below the detection limit of 0.001 f/cc. Based on the analytical results and the magnitude of the Site, the OSC referred the Site to the remedial site assessment section for further consideration as a potential NPL site.

In January 1992, the EPA remedial site assessment section conducted a Preliminary Assessment (PA) of the Site. The PA identified air as the major pathway of concern and soil exposure

providing another pathway of concern. The PA recommended that a Site Inspection (SI) with a prescore was needed to determine if the Site was a potential candidate for the NPL.

In October 1994, an SI of the Site was completed. Based on the data available at that time, the Site did not qualify as a potential candidate for inclusion on the NPL of Superfund sites. A decision of No Further Action Planned under Superfund was recommended.

2. Current actions

The most recent assessment has led to the determination that a removal action is appropriate at this time. Currently, there are no other response actions planned for the Site.

C. State and Local Authorities' Roles

1. State and local actions to date

Personnel from the LDEQ assisted the EPA with the removal assessment by performing tasks that included the extent of contamination survey, community relations, sample analysis and collection, and pertinent Site information. Jefferson Parish personnel have assisted by providing electronic files of the identification and current mailing addresses of the property owners with ACM.

In a letter dated June 6, 1996, the Assistant Secretary, Office of Legal Affairs and Enforcement, and the Assistant Secretary, Office of Air Quality and Radiation Protection, wrote EPA to officially request that EPA consider CERCLA action because existing State resources will not facilitate a timely response action (see Attachment 2).

2. Potential for continued State/local response

As noted in their removal request letter dated June 6, 1996, State and local agencies do not have the resources to adequately and timely respond to the immediate threats posed by this Site. However, LDEQ, the local Parishes and the Louisiana Department of Health and Hospitals (LDHH) have expressed a desire contribute to the removal action by assisting EPA in the community outreach effort, access to property for equipment storage and setting-up trailers, attaining fee and permit waivers when possible, and other in-kind services.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare

The current conditions at the Site meet the following factors which indicate that the Site is a threat to the public health, welfare or the environment and a removal action is appropriate under 40 CFR § 300.415(b)(2) of the NCP. Any or all of these factors may be present at a site yet any one of these factors may determine the appropriateness of a removal action.

1. Actual or Potential Exposure to Human Populations, Animals or the Food Chain; NCP § 300.415(b)(2)(i)

The potential impacts of asbestos exposure are chronic in nature and may not manifest themselves for a number of years after initial exposure. Diseases that are linked to asbestos include asbestosis, a chronic lung inflammation and a variety of lung cancers which vary in their prognoses. The most deadly cancer which is linked to inhalation of asbestos is mesothelioma, a disease which results in the destruction of the mesothelium, a lining surrounding various thoracic organs. Mesothelioma is 100% fatal within a period of one to two years after diagnosis.

The ACM areas are located in residential and public areas such that they are readily accessible to human populations. Much of the concrete-like ACM has deteriorated such that it is defined as friable asbestos. Asbestos fibers have been documented as being released from the ACM. The non-friable ACM provides a threat of release since it too will most likely deteriorate into a friable condition either naturally or artificially.

2. High Levels of Hazardous Substances or Pollutants or Contaminants in Soils Largely at or Near the Surface; NCP § 300.415(b)(2)(iv)

Analytical results have shown that the asbestos content of the ACM is typically in the 35-45% range and the surrounding soils in the 20-30% range. Historically, an action level of 1% asbestos in soils has been used for considering removal response actions. Additionally, asbestos may continue to spread from the ACM via air borne distribution, mechanical mechanisms, and surface water runoff causing further contamination of the surrounding area.

3. Weather Conditions That May Cause the Release or Migration of Hazardous Substances or Pollutants or Contaminants; NCP § 300.415(b)(2)(v)

Sampling results of the drainage areas adjacent to the ACM have shown that the asbestos has migrated, presumably from the

natural effects of weathering such as erosion. Furthermore, winds facilitate asbestos releases to the atmosphere.

4. Availability of Other Appropriate Federal or State Response Mechanisms to Respond to the Release; NCP § 300.415(b)(2)(vii)

There are no other timely response mechanisms available as evidenced by LDEQ's referral of the matter to EPA.

5. Other Situations or Factors That May Pose Threats; NCP § 300.415(b)(2)(viii)

The Agency for Toxic Substances and Disease Registry (ATSDR) has reviewed the EPA's finding to provide a health consultation (Attachment 4) regarding the public health threat posed by the Site.

B. Threats to the Environment

It is expected that the adverse and well-documented health effects experienced by humans would also be applicable to mammalion animal species. However, due to the latent impact of excessive asbestos exposure, where symptoms may not become manifests for as much as thirty years after exposure, the environmental impact of asbestos (unlike human exposure) is not a primary concern.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances, pollutants, or contaminants from this Site, if not addressed by implementing the response action selected in this Action Memorandum, will present an imminent and substantial endangerment to the public health, welfare, or the environment.

V. EXEMPTION FROM STATUTORY LIMITS

CERCLA Section 104(c), 42 U.S.C. § 9604(c), provides two bases for an exemption from the statutory time and dollar limits for removal actions. Those are the emergency and consistency exemptions. Since the proposed response action will exceed the $2 million statutory limit for removal actions, an emergency exemption is requested.

A. Emergency Exemption

As outlined below, the conditions at the Site meet all three of the "emergency waiver" criteria outlined in CERCLA Section 104(c), 42 U.S.C. § 9604.

1. There is an immediate risk to public health or welfare or the environment

The site consists of six-communities located on the bank of the Mississippi River which consists of over 500 areas determined to have asbestos-containing materials. An initial assessment by EPA and LDEQ in early 1990 of the contaminated area revealed that much of the ACM was in tact and maintaining its structural integrity. Since that assessment, the friability of such materials has increased dramatically and thus increased potential for human exposure. Friability is exacerbated by natural as well as mechanical disturbances such as walking pressures, mowing, driving, and recreational activities.

The need for emergency action is further supported by the particular location of the ACM which causes this site to pose substantial and imminent threats to the public health and welfare. More specifically, the asbestos containing materials are located in residential yards and driveways, school playgrounds, around day care centers, and in other areas easily accessed by the public. Children have been seen playing on driveways composed of friable ACM with toys and basketballs. Residents have been seen mowing grass with ACM outcropping in the yard, and dust clouds of ACM are being created by passing automobiles.

This deterioration of the ACM has increased the mobility of such materials, rendering them more of a threat of direct human contact through transfer by wind or direct soil exposure. Therefore, because asbestos is a CERCLA-designated hazardous substance and is found at the Site in quantities and physical form such that it poses a release or threat of release at the Site's numerous locations, there is an immediate risk to public health and welfare, and a corresponding need to abate such risks.

2. Continued response actions are immediately required to prevent, limit, or mitigate an emergency

The dramatic increase in friability and structural breakdown of ACM coupled with high public accessibility warrants immediate continued response. The site has not been secured and there remains potential for exposure to persons trafficking the area. That likelihood of fruition of that potential is further increased by the large number of people found in and around the contaminated area. Furthermore, as indicated above, the public's exposure to a known carcinogenic substance will become greater as friability increases and wind and soil contamination becomes more widespread.

3. Assistance will not otherwise be provided on a timely basis

LDEQ has provided written documentation of its inability to obtain adequate resources to implement a timely response to the conditions presented at the site. Specifically, by letter dated June 6, 1996, the Inactive and Abandoned Sites Division of LDEQ referred the Site to the EPA Superfund Division by requesting that EPA take responsibility for the site. In that same letter, LDEQ indicated that the State lacked sufficient resources to conduct a timely response action.

In addition, an enforcement-lead response action at the site does not appear possible. Extensive efforts have been made to identify PRPs involved at the Site.

VI. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

a) Complete a final Removal Action Plan delineating the final scope of the project including public outreach, field reconnaissance activities, and removal fieldwork. The scope will be utilized to detail a statement-of-work for the abatement contractor solicitation.

b) Abate the health threats posed by the ACM in the Westbank's residential properties and public access areas. The ACM will be excavated and transported to a local landfill for proper disposal.

The first areas to be targeted for removal will be the estimated 90 ACM locations found within one block of schools and day care centers. These locations are heavily trafficked by children and pose the greatest concern. The remaining ACM locations will be targeted based on the efficient scheduling and logistics of the work crews.

c) Remove a sufficient volume of ACM from each property to significantly reduce the likelihood of future releases. The visible ACM in the publicly accessible areas will be excavated to a depth of two feet. During the Removal Assessment, the ACM had a typical depth of four to six inches. If the ACM at a particular location unexpectedly exists at a depth greater than two feet, then the ACM will be covered with a geo-fabric liner and covered with backfill. The geo-fabric is intended to serve as a warning barrier if needed for future reference.

ACM located under houses, buildings, concrete slabs, and roadways will not be removed so as not to affect the integrity of the structures. These special cases account for only a small volume of ACM sources and should not be considered to pose a threat of ACM releases under normal circumstances. However, each area will be evaluated on a case-by-case basis to determine if additional measures should be taken to keep the ACM from becoming friable.

d) The excavated areas will be restored to as close to the original condition as can be reasonably achieved (i.e., the excavated ACM and soils will be replaced to original grade with like-material and vegetation re-established in residential areas).

All of the actions to be taken on-site during this response action will comply with all applicable, relevant and appropriate requirements (ARARS) to the extent practicable, considering the exigencies of the situation, and provide an effective mitigation of the imminent and substantial threats posed to the general public health, welfare and environment by the Site.

All hazardous substances, pollutants, or contaminants removed off-site pursuant to this action for treatment, storage, or disposal shall be treated, stored, or disposed at a facility in compliance, as determined by EPA pursuant to CERCLA Section 121(d)(3)), 42 U.S.C. § 9621(d)(3), and the following rule: "Amendment to the National Oil and Hazardous Substances Pollution Contingency Plan; Procedures for Planning and Implementing Off-Site Response Action: Final Rule." 58 FR 49200 (September 22, 1993), and codified at 40 CFR § 300.440.

All containers and waste bags taken off-site for disposal will be transported in accordance with the US Department of Transportation (USDOT) requirements. See Generally 40 CFR 172. Waste handling and waste disposal will be in accordance with the substantive requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) found at 40 CFR §§ 61.01-19 and the National Emission Standard for Asbestos (NESA) found at 40 CFR §§ 61.140-157. Emissions of particulate asbestos material to the outside air shall be handled, monitored and controlled in accordance with National Emission Standard for Asbestos 40 CFR §§ 61.150-151.

Other requirements under the Occupational Safety and Health Act (OSHA) of 1970, 29 U.S.C. § 651 et. seq., and under the laws of States with plans approved under section 18 of the State's OSHA laws, as well as other applicable safety and health requirements, will be followed. Federal OSHA requirements include, among other things, all OSHA General Industry (29 CFR Part 1910) and Construction (29 CFR Part 1926) standards wherever they are relevant, as well as OSHA record keeping and reporting

regulations, the EPA regulations set forth in 40 CFR Part 300, and other EPA policies/guidelines relating to the conduct of work at Superfund sites.

2. Contribution to remedial performance

This action is expected to complete the necessary response needed at this Site. No further remedial action is expected. This action removes the source of contamination and would be consistent with any future remedial action.

3. Description of alternative technologies

An alternative response action considered was to have the ACM encapsulated to minimize the release of the asbestos. While this alternative could be achieved at an initial cost savings, it would only serve to temporary mitigate the threat of release. After the removal completion, there would be no means to provide maintenance of the encapsulated ACM. Ultimate break-down of the encapsulated material is expected and ACM removal will then be required.

4. Applicable or relevant and appropriate requirements

This removal action will be conducted to eliminate the threat or potential threat of a hazardous substance, pollutant or contaminant pursuant to CERCLA, 42 U.S.C § 9601 et seq., and in a manner consistent with the National Contingency Plan, 40 CFR Part 300, as required at 33 U.S.C. § 1321(c)(2) and 42 U.S.C. § 9605.

As per 40 CFR § 300.415(i), fund-financed removal actions under CERCLA Section 104 and removal actions pursuant to CERCLA Section 106 shall to the extent practicable considering the exigencies of the situation, attain the applicable or relevant and appropriate requirements under Federal environmental law, including, but not limited to, the Safe Drinking Water Act (SWDA), 42 U.S.C. § 300f et seq., the Clean Air Act (CAA), 42 U.S.C. §7401 et seq., the Clean Water Act (CWA), 33 U.S.C. §1251 et seq., the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq., or any promulgated standard, applicable or relevant and appropriate requirements, criteria, or limitation under a State environmental or facility siting law that is more stringent than any Federal standard, requirement, criteria, or limitation contained in a program approved, authorized or delegated by the Administrator and identified to the President by the State.

Additionally, because this removal action involves the handling and disposal of asbestos-containing materials, the substantive NESHAP provisions governing monitoring and disposal of asbestos found at 40 CFR §§ 61.150-151 are deemed to be applicable.

5. Project schedule

After the approval of the proposed removal action, the process to contract an asbestos abatement company will begin and may take one month to award. Afterwards, it is expected that the project will require an additional six to eight months to complete.

B. Estimated Costs

Extramural Costs

U.S. Corp. of Engineers (IAG)	$4,300,000
START	$ 300,000
Subtotal, Extramural Costs	$4,600,000
Extramural Costs Contingency (20%)	$ 900,000
TOTAL, EXTRAMURAL COSTS	$5,500,000

Intramural Costs

EPA Direct Costs	$ 100,000
EPA Indirect Costs	$ 150,000
TOTAL, INTRAMURAL COSTS	$ 250,000
TOTAL, REMOVAL PROJECT CEILING	**$5,750,000**

VII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If action is not taken or delayed significantly longer at the Site, the ACM driveways, servitudes and other publicly-accessible areas found at the Westbank Asbestos Site would continue to deteriorate and release friable asbestos into the environment and human breathing zones. Therefore, failure to implement a timely response will almost certainly result in more wide-spread contamination with greater public environmental insult, and potentially greater public health and welfare risks.

VIII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues regarding this Site.

IX. ENFORCEMENT

See Attachment 1 for the Enforcement Addendum.

X. RECOMMENDATION

This decision document represents the selected removal action for the Westbank Asbestos Site, in Marrero, Jefferson Parish, Louisiana developed in accordance with CERCLA, 42 U.S.C. §9601 et seq, and not inconsistent with the NCP, 40 CFR Part 300. This decision is based on the administrative record for the Site.

Conditions at the Site meet the criteria as defined by 40 CFR § 300.415(b)(2) of the NCP for a removal. In addition, the proposed actions are consistent with the CERCLA Section 104(c)(1)(A), 42 U.S.C. §9604(c)(1)(A), emergency exemption from the $2 million statutory limit. I recommend your approval of the proposed removal action and $2 million exemption request. The total project ceiling, if approved, will be $5,750,000. Of this, an estimated $4,300,000 comes from the Regional removal funds.

APPROVED Jerry Clifford for DATE 8/23/96